

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

| | | |
|---------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA, | : | CASE NO.: 5:21-CR-00169 |
| | : | |
| Plaintiff, | : | |
| | : | JUDGE PAMELA A. BARKER |
| vs. | : | |
| | : | |
| SHAKUR J. MOSS, | : | <u>UNOPPOSED MOTION TO</u> |
| | : | <u>CONTINUE THE FINAL</u> |
| Defendant. | : | <u>PRETRIAL AND CONVERT</u> |
| | : | <u>TO A CHANGE OF PLEA</u> |
| | : | <u>HEARING</u> |

Defendant, through counsel, respectfully moves this Honorable Court to continue the final pretrial currently scheduled for August 17, 2023, until August 25, 2023. Also, the defendant would like to convert the final pretrial to a change of plea hearing. If the Court is not available on August 25, 2023, the parties propose the August 29, 2023 trial date be converted to a change of plea hearing. Assistant United States Attorney Peter E. Daly has no objection to this motion.

The reason for this request is that counsel is scheduled to be out of town on August 17, 2023 and needs additional time to prepare Mr. Moss for the change of plea hearing. The request for this continuance is made in the interest of justice and not for needless delay. The interests of justice outweigh the public's interest in a speedy trial and would best be served by granting this motion. *See* 18 U.S.C. § 3161(h)(7)(A).

For the reasons above, Mr. Moss requests the Court grant this motion.

Respectfully submitted,

STEPHEN C. NEWMAN
Federal Public Defender
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/s/ Timothy C. Ivey

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